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J. Douglas
9/2/04

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	CHRISTOPHER J. LORD; KARL O. LILLEVOLD; GIM DEISHER	§ § § §	Group Art Unit: 2614
Serial No.:	09/448,679	§ §	
		§	Examiner: Trang U. Tran
Filed:	November 24, 1999	§ §	
For:	NOISY EDGE REMOVAL FOR VIDEO TRANSMISSION	§ § §	Atty. Dkt. No.: ITL.0252US (P7381)

Mail Stop Appeal Brief-Patents
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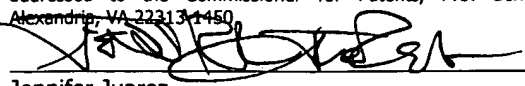Technology Center 2600

REPLY BRIEF

Sir:

Applicants respectfully file this Reply Brief in response to the Examiner's Answer mailed on June 17, 2004.

I.   REPLY

In addition to the reasons set forth in Applicant's Appeal Brief, the appealed claims are patentable for the further reasons discussed herein.

Specifically, claim 1 is patentable for the further reason that nowhere does Lawlor teach that the data errors discussed therein are caused by noise. Furthermore, even if the data errors are somehow considered to be noise, Lawlor does not disclose identifying noise in a first portion of a video frame. In this regard, the portion of Lawlor relied upon by the Examiner (col. 13, ln. 57-col. 14, ln. 24) merely determines whether data elements are valid or invalid. Such validity or invalidity does not identify noise, at least because data may be invalid for myriad reasons. Thus,

there is no identification of noise in a first portion of a video frame in Lawlor. For these further reasons, claim 1 and the claims depending therefrom are patentable.

With respect to claims 2, 11, and 18, nowhere does the portion of Lawlor contended to meet these claims disclose associating a noise level with a first portion of a video frame. Instead, col. 12, lns. 44-64 of Lawlor merely discloses that checks are made to: determine a frequency range of a sub-band containing an error; determine whether errors exist in previous and subsequent frames (i.e., not the claimed video frame); and check for errors in elements surrounding a corrupted element. Claims 2, 11, 18 and the claims depending therefrom are thus further patentable, as Lawlor does not disclose associating a noise level with a first portion of a video frame.

Claims 7, 14, and 23 depend from claims 2, 11, and 18, respectively, and further recite that comparing the noise level to a predetermined value comprises associating the predetermined value to the type of video input signal. Again, the Examiner relies upon col. 13, ln. 57-col. 14, ln. 24 of Lawlor to contend anticipation. However, this portion of Lawlor nowhere discloses that a predetermined value is associated to a type of video signal. Instead, this portion of Lawlor merely discloses that the threshold level varies according to a spatial frequency range of a sub-band containing a corrupted element. Nowhere does this teach associating a predetermined value to a type of video input signal.

In addition to the reasons discussed above regarding claim 1, claim 9 is further patentable as Lawlor does not disclose a storage medium including a software program to perform as claimed in claim 9. In this regard, the Examiner admits that the error flag analyzer 760, contended to be a storage medium including a software program "is effectively a look-up table." Answer, p. 6. However, a look-up table does not include a software program. Instead, as

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disclosed in Lawlor based on inputs "which may be considered as the address inputs" the error flag analyzer provides two outputs. Lawlor col. 15, lns. 39-58. Accordingly, claim 9 and the claims depending therefrom are further patentable as the look-up table of Lawlor does not include a software program.

Regarding claim 25, the Examiner contends that FIGS. 15B-15E of Lawlor somehow disclose analyzing portions of a video frame with different adjacent portions. However, FIGS. 15D-15E of Lawlor are merely used to show selection of concealment coefficients based on error flags. These error flags are not portions of a video frame. Nor is there any analysis performed between different portions of a video frame with corresponding adjacent portions. Accordingly claim 25 and the claims depending therefrom are patentable over Lawlor for this further reason.

II.   CONCLUSION

For the reasons set forth herein, as well as set forth in the Appeal Brief, Applicants respectfully request that each of the final rejections be reversed and that the claims subject to this Appeal be allowed to issue.
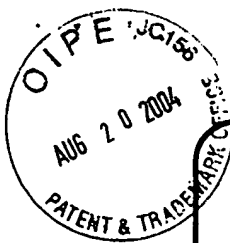
Respectfully submitted,

Date:_____August 16, 2004

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TRANSMITTAL FORM

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ENCLOSURES *(check all that apply)*

- [ ] Fee Transmittal Form
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- [ ] Amendment / Response
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  - [ ] Affidavits/declaration(s)
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- [ ] Response to Missing Parts/ Incomplete Application
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Remarks

- [ ] After Allowance Communication to Group
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Reply Brief (in triplicate)

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